

To: Russ, Timothy[Russ.Tim@epa.gov]
From: Russ, Timothy
Sent: Thur 9/5/2013 9:31:52 PM
Subject: BLM Proposed General Conformity Exempt List (TJR-Relevant Info./ State docs & guidance/ sample State permits / FAA info.)
March 2010 FINAL OG GUIDANCE.pdf
13400per.pdf
13400ana.pdf
13400offset.pdf
8122per.pdf
WY Interim Permit Policy.pdf
J-nichols-Drill-Rig-petition-EPA-response-6-2-09.pdf

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Ex. 5 - Deliberative Process

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The State's website for the annual emissions is at

<http://deq.state.wy.us/aqd/Actual%20Emissions.asp>. At this website, click on the **Composite Annual 2011 UGRB Public Emission Inventory** to open the Excel spreadsheet with the UGRB 2011 annual emissions broken out by "Production" and "Compressor Stations". As can be seen in the "Production" spreadsheet, not all the oil and gas categories the BLM is considering for "Presumed to Conform" appear; however, under the tab "Emissions Total" the categories "Venting & Blowdown" and "Completion" do appear and these emissions are sizable for the whole UGRB (note: *de minimus* levels are less than 100 TPY):

From the "Production" spreadsheet and the (tons) are in Tons Per Year.

Sources	PM2.5		PM10		NO _x		VOCs	
	(lb/hr)	(tons)	(lb/hr)	(tons)	(lb/hr)	(tons)	(lb/hr)	(tons)
Stationary Engines	3.48	9.27	10.20	38.40	69.97	205.55	23.28	63.61
Heaters	41.66	55.87	41.66	55.87	548.12	735.07	30.15	40.43
Tanks	0.00	0.00	0.00	0.00	19.60	85.73	395.351	316.67
Dehydration Units	0.00	0.00	0.00	0.00	100.37	430.36	826.293	192.30
Pneumatics	0.00	0.00	0.00	0.00	54.92	126.70	1,652.564	462.38

Fugitives	0.00	0.00	0.00	0.00	0.00	0.00	770.623,375.34
Venting & Blowdown	0.00	0.00	0.00	0.00	31.34	0.02228,803.16	923.05
Drill Rigs	105.18	22.63	110.01	24.72	2,083.80	491.89	127.59 43.18
Completions	340.10	19.19	380.31	22.77	12,210.76	780.68	2,307.82 106.52

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guidance document:

Below are excerpts from the 2010 State

Well Completions

Operators shall submit applications to perform well completions using **Best Management Practices**. One permit will be issued to each company that drills and completes wells within the JPAD area. The permits will be modeled after those issued to companies completing wells in the Jonah and Pinedale Anticline Development Area. An example of a well completions or “Green Completions” permit is available on the AQD website, <http://deq.state.wy.us/aqd> or a copy may be obtained by contacting the Wyoming Air Quality Division at (307) 777-7391 or (307) 473-3475.

Green Completion permit applications shall be filed with the Division by November 1, 2010.

Blow down/Venting

Best Management Practices (BMP) and information gathering requirements will be incorporated into permits for new and modified facilities.

BMP: During manual and automated blow down/venting episodes associated with liquids unloading, wellbore depressurization in preparation for maintenance or repair, hydrate clearing, emergency operations, equipment depressurization, etc., associated VOC and HAP emissions shall be minimized to the extent practicable. During manual blow down or venting, personnel shall remain on site to ensure minimal gas venting occurs.

Information Gathering: Specific recordkeeping and reporting requirements will be established during the permitting process and will include estimates of associated regulated air pollutants, reasons for episodes, durations of episodes, steps taken to minimize emissions and descriptions of emission estimation methods.

For companies with existing facilities as of the date of this Guidance, blow down and venting permit applications shall be filed by November 1, 2010.

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Draft notice and request for comment:

<http://www.gpo.gov/fdsys/pkg/FR-2007-02-12/pdf/E7-2241.pdf>

Final Notice

http://www.faa.gov/airports/resources/publications/federal_register_notices/media/environmental_72fr41576.pdf

D.) The following is from Cole Anderson (WYDEQ):

"Attached are the permit examples Tina referenced in her last email. Two documents, **13400ana.pdf** and **13194ana.pdf**, are final analyses that were drafted for oil and gas sites in the non-attainment area. We organize our analyses (a.k.a. statement of basis) to address the proposed project and applicable regulations in the beginning. Next we list our proposed permit conditions. Finally, we include emissions tables and a table showing the offset calculation for the proposed project.

Also attached to the email are electronic versions of spreadsheets that we generate for each application. The spreadsheet is one large table of all permitting actions for the company that involve offsets. This spreadsheet and the Division's analysis are published for public comment."



13400ana.pdf



13400offset.pdf



13400per.pdf

1.) On page 6 of permit 13400, the following appears:

"A Chapter 6, Section 2(c)(ii) demonstration in accordance with the **Division's Interim Policy** has been conducted. Emission offset requirements, if applicable, have been applied to this permitting action at a ratio of 1.5:1.0 for VOCs and 1.1:1.0 for NO_x."

2.) On page 6 of the permit, the following appears:

"EnCana has chosen to offset NO_x emissions by reducing emissions associated with their drill rig fleet. Permit conditions have been established to make the commitments to control emissions federally enforceable."

3.) From Tina Anderson (WYDEQ):

"The permits will sometimes include the drill rig emissions if the company has volunteered to submit to that process, but even those controlled scenarios are handled through minor source permits. "

From Cole Anderson (WYDEQ) - - **"voluntary" drill rig fleet permit:**



8122per.pdf

E.) Letter of June 2, 2009, to Jeremy Nichols of WEG, addressing non-road drill rig engines.

